



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2024-0012: ELA trainings and workshops on PROGRESS

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)**1.1 GENERAL INFORMATION**

Record reference	DPR-ELA-2024-0012
Title of the processing operation	ELA trainings and workshops under PROGRESS activities
Controller entity	European Labour Authority, Cooperation Support Unit
Joint controllers	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below
Processor(s)	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below
Internal organisation(s)/entity(ies) Names and contact details	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
External organisation(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES European Commission Joint Research Centre Rue Camps de Mars 21, Brussels, Belgium Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation or Refulation (EU) 2018/17125
Data Protection Officer Name and contact details	Laura NUNEZ BAREZ Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
Corporate Record	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Language of the record	English
Record Model	<input checked="" type="checkbox"/> N/A

¹ Pursuant to **article 31** of the new data protection regulation for EU institutions and bodies (**Regulation (EU) 2018/1725**) each controller and processor have to maintain a **record of processing activities** under its responsibility that contains at least the information listed under that article.

1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

1.2.1 Purpose

The Cooperation Support Unit of the European Labour Authority (ELA) promotes specific trainings, workshops and events related to the Electronic Exchange of Social Security Information (EESSI) system under the ELA's PROGRESS Mutual Learning and Understanding Programme.

Training and other activities are organized by liaising with external and internal training providers and/or external organisations, and its organisation will involve handling personal data.

The trainers/speakers/moderators can be internal ELA staff members or external providers. Trainers from external service providers or organisations could be contacted to plan the specific objectives and description of the training sessions and other PROGRESS events.

Activities can take place both inside and outside the Authority as well as on online platforms like Webex or MS Teams. The activities will be advertised by ELA. The training sessions and other events may be recorded on video, edited and uploaded on EU Academy (the EC training platform with the restricted access to authorised users only) or ELA systems.

In case of both on-site and online meetings, photographs, screenshots, and/or video recordings of the trainers, participants and organisers may be taken and published in the context of ELA's PROGRESS Mutual Learning and Understanding Programme at ELA's website, social media channels, CIRCABC, and ELA Learning Management Platform.

The audience or non-speaker participants are not photographed/individually or in groups. They could also appear in panoramic photographs/videos of the whole event/audience.

Participants that do not wish to be part of the recording/publishing activities have the possibility to object to processing by notifying ELA staff present at the meeting/event or by turning off their computer camera and avoiding taking the floor at the recorded online events.

1.2.2 Processing for further purposes

- Archiving in the public interest
- Scientific or historical research purposes
- Statistical purposes
- N/A

Safeguards in place to ensure data minimisation

- Pseudonymisation
- Any other, specify

1.2.3 Modes of processing

1. Automated processing (Article 24)
 - a. Computer/machine
 - i. automated individual decision-making , including profiling
 - ii. Online form/feedback
 - iii. Any other, specify
2. Manual processing
 - a. Word documents
 - b. Excel sheet
 - c. Any other, specify

Description

The meetings take place online via MS Teams or Webex. Privacy Statements of these tools apply.

1.2.4 Storage medium

1. Paper
2. Electronic
 - a. Digital (MS documents (Word, excel, Powerpoint), Adobe pdf, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
 - b. Databases
 - c. Servers
 - d. Cloud
3. External contractor premises

1.2.5 Comments on the processing of the data

ELA will create video recordings through MS Teams/Webex. The video recordings will be published on the EU Academy platform.

For the EU Academy, the record that applies is '[DPR-EC-05546 - EU Academy e-learning platform](#)'

For the CIRCABC, the record '[DPR-ELA-2024-001 CIRCABC at the European Labour Authority](#)' applies.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	ELA Staff
2. External to organisation	External trainers/speakers/organisers or form other EU institutions Participants

1.3.2 Data categories/fields

Indicate the categories of data that will be processed:

- Name, Surname, title, name of organisation represented, e-mail address, Member state. Reports, PowerPoint presentations or relevant documentation used during meetings can be collected and shared with meeting participants.
- Specific consent for the trainers.
- Also live web streaming and/or audio and video recording of trainers and participants can be registered and published and/or shared in the framework of the ELA activities.
- In some cases, third party IT tools, including Social Media (to be specified in the Privacy Statement by the organiser).
- For digital events, the data protection records for the relevant tools and platforms apply.

Video of the workshop and trainings dedicated to PROGRESS of the trainers, organisers and participants, will be recorded and published on the EU Academy.

Specific instructions will be provided at the beginning of the session in order to explain the data subjects the process of their personal data and possibility to opt-out and switch off their cameras and audio to avoid recording.

1.3.2.1 Special categories of personal data

Indicate if the processing operation concerns any 'special categories of data' which fall(s) under Article 10(1), which shall be prohibited unless any of the reasons under article 10(2) applies:

Yes , the processing concerns the following special category(ies):

<p>Data revealing</p> <p><input type="checkbox"/> racial or ethnic origin,</p> <p><input type="checkbox"/> political opinions,</p> <p><input type="checkbox"/> religious or philosophical beliefs,</p> <p><input type="checkbox"/> trade union membership,</p> <p>Or/and,</p> <p><input type="checkbox"/> Genetic data, biometric data for the purpose of uniquely identifying a natural person,</p> <p><input type="checkbox"/> Data concerning health,</p> <p><input type="checkbox"/> Data concerning a natural person's sex life or sexual orientation.</p> <p><input checked="" type="checkbox"/> N/A</p>
--

1.3.2.2 Data related to 'criminal convictions and offences'

<p>The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'</p>	<p>N/A <input checked="" type="checkbox"/></p> <p>Yes <input type="checkbox"/></p>
---	--

1.4 RETENTION PERIOD

Indicate the administrative time limit(s) for keeping the personal data per data category, and if known, specify the start/end date, or describe the specific start/end moment of each time limit:

Data category	Retention period
Data categories related to the participants	Will be kept for maximum one year after the workshop dedicated to the road transport of passengers before being deleted.
Training material (audiovisual material)	The video recording will remain published on EU Academy as long as it is still valid from an educational point of view.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	Staff of the Cooperation Support Unit on a need to know basis
2. <input checked="" type="checkbox"/> Outside the EU organization	Staff of the external contractor National authorities representatives

Categories of the data recipients
<p>1. <input checked="" type="checkbox"/> A natural or legal person</p> <p>2. <input type="checkbox"/> Public authority</p> <p>3. <input type="checkbox"/> Agency</p> <p>4. <input type="checkbox"/> Any other third party, specify</p> <p>Specify who has access to which parts of the data:</p>

Description

The meeting/training will be recorded and will be available to appointed staff from Member States through the EU Academy platform.
 All data categories will be available to organisers of the meeting, workshop or specific activities.
 For onsite meetings/workshops a specific Privacy Statement will be prepared by the organisers.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data
<p>1. Transfer outside of the EU or EEA</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> YES,</p>
<p>2. Transfer to international organisation(s)</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> Yes, specify further details about the transfer below</p>
<p>3. Derogations for specific situations (Article 50.1 (a) –(g))</p> <p><input checked="" type="checkbox"/> N /A</p> <p><input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p>

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects
<p><i>Article 17 – Right of access by the data subject</i></p> <p><i>Article 18 – Right to rectification</i></p> <p><i>Article 19 – Right to erasure (right to be forgotten)</i></p> <p><i>Article 20 – Right to restriction of processing</i></p> <p><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i></p> <p><i>Article 22 – Right to data portability</i></p> <p><i>Article 23 – Right to object</i></p> <p><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i></p>

1.7.1 Privacy statement

The data subjects are informed about their rights and how to exercise them in the form of the a privacy statement attached to this record.

Publication of the privacy statement

Published on website

Web location:

- ELA internal website (URL: SharePoint on Personal Data Protection)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify

PS will be shared on EU Academy and at the Webex trainings.

Guidance for Data subjects which explains how and where to consult the privacy statement is available and will be provided at the beginning of the processing operation.

Description:

Data subjects will be informed of the Privacy Statement at the moment of the invitation to the event and in the invitation email.

Instruction will be given at the beginning of each training session in order to let the participants know the process of personal data and their rights on this respect.

Data subjects can contact directly the organisers at ela-progress@ela.europa.eu.

Specific consent on the recording from the external trainers will be gathered, according to Record "[DPR-ELA-2023-0008 ELA independent expert management](#)".

1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

Description:

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Labour Authority or of its contractors.

The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation.

In order to protect personal data, the European Labour Authority has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.